

## REMARKS

Section A lists the status of claims. Sections B and C respond to the 35 USC 102 and 35 USC 103 rejections in the Office action of April 23, 2007.

### A. Status of the Claims

Claims 1-36 are pending in the application. Claims 1-6, 9, 12-20, and 23 were rejected under 35 USC 102(b) as being anticipated by Lee et al., US Patent No. 4,968,255. Claims 7-8, 10-11, 21-22, and 24-25 were rejected under 35 USC 103(b) as being unpatentable over Lee et al. Claims 26-36 are withdrawn from consideration.

### B. 35 USC 102(b) Rejections, Lee et al.: Claims 1-6, 9, 12-20 and 23

Claims 1-6, 9, 12-20, and 23 were rejected under 35 USC 102(b) as being anticipated by Lee et al.

Claim 1 recites an apparatus comprising a first base; and a plurality of modules each having an identity, said base and modules comprising circuitry wherein: when a first module is attached to the first base, and *an arbitrary number of modules of the plurality of modules are attached, directly or indirectly, to the first module*, the circuitry determines an order and the identities of all attached modules.

Applicants will concede that Lee et al. teach a base, and that modules may be attached *to the base*. As Lee et al. describe, an answer block is inserted into an input cavity in response to an audible prompt (Abstract, Fig. 1, e.g.) There may be multiple cavities, and exactly one block may be inserted into any cavity (see Fig. 1.)

Claim 1 similarly recites a base and a plurality of modules. But Applicants will respectfully point out that, while claim 1 recites a first module attached to a base, it further recites additional modules which are attached *not* to the base itself, but *to the first*

*module*. Such an arrangement appears, for example, in Fig. 1a of the present application. A first module 301 is attached to base 300. A second module 302 is attached *not* to base 300, but to first module 301. A third module 303 is attached to base 300, but to second module 302, forming a string.

Lee et al. teach that any of the answer blocks can be inserted into any of the input cavities shown Fig. 1. However, Applicants can find no teaching in Lee et al. of a first answer block inserted into an input cavity, and a second answer block attached not to an input cavity, but *to the first answer block*. The detailed description of how the means of attaching an answer block to the input cavity allows it to be identified (Figs. 3 and 4, col. 8, line 64-col.9, line 50) makes clear that the answer blocks are adapted for insertion into the input cavities, but there is no suggestion that the answer blocks are intended to attach *to each other*, nor any teaching of how such connection is best implemented.

Independent claim 19 similarly recites that additional modules may be attached *to the first module*.

Applicants have shown that Lee et al. fail to teach a first module attached to a base and additional modules attached directly or indirectly *to the first module*. The reference fails to teach each and every element of the claim; Applicants respectfully request withdrawal of the 35 USC 102(b) rejection of claims 1-6, 9, 12-20, and 23.

**C. 35 USC 103(b) Rejections, Lee et al.: Claims 7-8, 10-11, 21-22, and 24-25**

Claims 7-8, 10-11, 21-22, and 24-25 were rejected under 35 USC 103(b) as being unpatentable over Lee et al.

Applicants showed in section B of these remarks that independent claims 1 and 19 distinguish over the teachings of Lee et al. Dependent claims 7-8, 10-11, 21-22, and 24-

25 thus similarly distinguish. Applicants respectfully request withdrawal of the 35 USC 103(b) rejection of these claims.

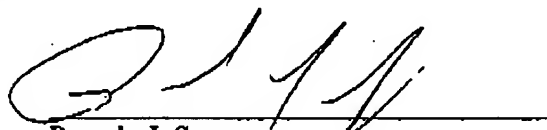
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**CONCLUSION**

In view of the preceding Remarks, Applicants submit that this application is in condition for allowance. Reconsideration is respectfully requested. If objections remain, Applicants respectfully request an interview. In the event that objections remain, the Examiner is asked to contact the undersigned agent at (650) 726-5260.

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Date



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